

# Exhibit B

## Plaintiff's Complaint



## Corporate Creations Network Inc.

11380 Prosperity Farms Road #221E, Palm Beach Gardens, FL 33410

Sixt Rent A Car, LLC  
 Legal Dept  
 Sixt Rent A Car, LLC  
 1501 NW 49th St  
 Fort Lauderdale FL 33309

04/10/2019

## SERVICE OF PROCESS NOTICE

The following is a courtesy summary of the enclosed document(s). **ALL information should be verified by you.**

Item: 2019-32

Note: Any questions regarding the substance of the matter described below, including the status or how to respond, should be directed to the contact set forth in line 12 below or to the court or government agency where the matter is being heard. **IMPORTANT:** All changes or updates to the SOP contact individuals or their contact information must be submitted in writing to [SOPcontact@corpcreations.com](mailto:SOPcontact@corpcreations.com). Any changes will become effective upon written confirmation of Corporate Creations.

1.	<b>Client Entity:</b> Sixt Rent A Car, LLC
2.	<b>Title of Action:</b> John Stinson, an individual; Duniesky Velazquez - Escobedo vs. Doe Driver I-V, et al.
3.	<b>Document(s) Served:</b> Summons Complaint
4.	<b>Court/Agency:</b> Clark County District Court
5.	<b>State Served:</b> Nevada
6.	<b>Case Number:</b> A-19-792216-C
7.	<b>Case Type:</b> Negligence / Injuries
8.	<b>Method of Service:</b> Hand Delivered
9.	<b>Date Received:</b> Tuesday 4/9/2019
10.	<b>Date To Client:</b> Wednesday 4/10/2019
11.	<b># Days When Answer Due:</b> 20 <b>Answer Due Date:</b> 04/29/2019 <div style="margin-left: 20px;"> <b>CAUTION:</b> Client is solely responsible for verifying the accuracy of the estimated Answer Due Date. To avoid missing a crucial deadline, we recommend immediately confirming in writing with opposing counsel that the date of the service in their records matches the Date Received.         </div>
12.	<b>SOP Sender:</b> Kimball J. Jones, Esq. (Name, City, State, and Phone Number) Las Vegas, NV 702-333-1111
13.	<b>Shipped To Client By:</b> Regular Mail and Email with PDF Link
14.	<b>Tracking Number:</b>
15.	<b>Handled By:</b> 291
16.	<b>Notes:</b> None.

**NOTE:** This notice and the information above is provided for general informational purposes only and should not be considered a legal opinion. The client and their legal counsel are solely responsible for reviewing the service of process and verifying the accuracy of all information. At Corporate Creations, we take pride in developing systems that effectively manage risk so our clients feel comfortable with the reliability of our service. We always deliver service of process so our clients avoid the risk of a default judgment. As registered agent, our role is to receive and forward service of process. To decrease risk for our clients, it is not our role to determine the merits of whether service of process is valid and effective. It is the role of legal counsel to assess whether service of process is invalid or defective. Registered agent services are provided by Corporate Creations Network Inc.

1 SUMM  
2 KIMBALL J. JONES, ESQ.  
3 Nevada Bar No.: 12982  
4 JACOB G. LEAVITT, ESQ.  
5 Nevada Bar No.: 12608  
6 BIGHORN LAW  
7 716 South Jones Blvd.  
8 Las Vegas, NV 89107  
9 Telephone: (702) 333-1111  
10 [Jacob@BighornLaw.com](mailto:Jacob@BighornLaw.com)  
11 *Attorneys for Plaintiff*

12  
13 DISTRICT COURT  
14 CLARK COUNTY, NEVADA

15 JOHN STINSON, an individual; DUNIESKY  
16 VELAZQUEZ-ESCOBEDO, an individual,

17 CASE NO: A-19-792216-C  
18 DEPT. NO: Department 31

19 Plaintiffs,  
20 v.

21 DOE DRIVER I-V, an individual; SIXT RENT A  
22 CAR, LLC, a foreign limited liability company;  
23 DOE DRIVER II-V; ROE EMPLOYERS X-V;  
24 DOE OWNER I-V; and ROE CORPORATIONS  
25 XI-XV, inclusive, jointly and severally,

26 Defendants.

27 **SUMMONS**

28 **NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST YOU  
WITHOUT YOU BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS. READ  
THE INFORMATION BELOW.**

29 **TO THE DEFENDANT.** A Civil Complaint has been filed by the plaintiff(s) against you for the  
30 relief set forth in the Complaint.

31 **SIXT RENT A CAR, LLC**

32 1. If you intend to defend this lawsuit, within 20 days after this Summons is served on  
33 you exclusive of the date of service, you must do the following:  
34

1           a. File with the Clerk of this Court, whose address is shown below, a formal  
2           written response to the Complaint in accordance with the rules of the Court.  
3           b. Serve a copy of your response upon the attorney whose name and address  
          is shown below.

4           2. Unless you respond, your default will be entered upon application of the plaintiff(s)  
5           and this Court may enter a judgment against you for the relief demanded in the Complaint, which  
6           could result in the taking of money or property or other relief requested in the Complaint

7           3. If you intend to seek the advice of an attorney in this matter, you should do so  
8           promptly so that your response may be filed on time.

9           Issued at the direction of:

10           **BIGHORN LAW**

11  
12           By: /s/ Jacob G. Leavitt  
13           **KIMBALL JONES, ESQ.**  
14           Nevada Bar No.: 12982  
15           **JACOB G. LEAVITT, ESQ.**  
16           Nevada Bar No.: 12608  
17           716 S. Jones Blvd.  
18           Las Vegas, Nevada 89107  
19           702-333-1111  
20           *Attorneys for Plaintiff*

21           **STEVEN D. GRIERSON**

22           **CLERK OF COURT**

23           By: Marie Kramer  
24           Deputy Clerk  
25           County Courthouse      4/3/2019  
26           200 Lewis Avenue  
27           Las Vegas, Nevada 89101  
28           Marie Kramer

Electronically Filed  
4/2/2019 9:06 PM  
Steven D. Grierson  
CLERK OF THE COURT



1 COMP

2 KIMBALL J. JONES, ESQ.

3 Nevada Bar No.: 12982

4 JACOB G. LEAVITT, ESQ.

5 Nevada Bar No.: 12608

6 BIGHORN LAW

7 716 S. Jones Blvd.

8 Las Vegas, Nevada 89107

9 Phone: (702) 333-1111

10 Fax: (702) 507-0092

11 Email: [jacob@bighornlaw.com](mailto:jacob@bighornlaw.com)

12 *Attorneys for Plaintiffs*

CASE NO: A-19-792216-C

Department 31

9 DISTRICT COURT

10 CLARK COUNTY, NEVADA

11 JOHN STINSON, an individual; DUNIESKY  
12 VELAZQUEZ-ESCOBEDO, an individual,

CASE NO:  
DEPT. NO:

13 Plaintiffs,

14 v.

COMPLAINT

15 DOE DRIVER I-V, an individual; SIXT RENT A  
16 CAR, LLC, a foreign limited liability company; DOE  
17 DRIVER II-V; ROE EMPLOYERS X-V; DOE  
OWNER I-V; and ROE CORPORATIONS XI-XV,  
inclusive, jointly and severally,

18 Defendants.

19  
20 COME NOW, Plaintiffs, JOHN STINSON, an individual, and DUNIESKY VELAZQUEZ-  
21 ESCOBEDO, an individual, by and through their counsel, KIMBALL J. JONES, ESQ., and JACOB G.  
22 LEAVITT, ESQ., of BIGHORN LAW, and for their causes of action against Defendants, and each of  
23 them, allege as follows:

24 1. That PLAINTIFF JOHN L. STINSON (hereinafter referred to as "PLAINTIFF STINSON") was  
25 at all times relevant to this action a resident of the County of Clark, State of Nevada.  
26 2. That PLAINTIFF DUNIESKY VELAZQUEZ-ESCOBEDO (hereinafter referred to as  
27 "PLAINTIFF VELAZQUEZ") was at all times relevant to this action a resident of the County of  
Clark, State of Nevada.

1 3. Upon information and belief, at all times relevant to this action, DEFENDANT DOE DRIVER I-  
2 V and/or DOE OWNER II-V, are and/or were operating/driving a 2016 Mercedes-Benz CLA on  
3 the roads and highways of County of Clark, State of Nevada, is believed to be resident of Clark  
4 County.

5 4. Upon information and belief, that at all times relevant to this action DEFENDANT SIXT RENT  
6 A CAR, LLC (hereinafter "SIXT RENT A CAR") and/or DOE OWNER I-V, was and is a  
7 business entity and/or an individual who was the owner or co-owner of the said 2016 Mercedes-  
8 Benz driven by and/or DOE DRIVER I and/or DOE DRIVER II-V, at the time of the subject  
9 collision.

10 5. Upon information and belief, at all times relevant to this action, DEFENDANT DOE DRIVER I  
11 and/or DOE DRIVER II-V, was and is a resident(s) of Clark County, Nevada and/or was  
12 operating/driving the said 2016 Mercedes-Benz upon the roads and highways of the County of  
13 Clark, State of Nevada, at the time of the subject collision.

14 6. Upon information and belief, at all times relevant to this action, DEFENDANT DOE OWNER I-  
15 V, is and was a resident of the County of Clark, State of Nevada and/or was or is the owner of the  
16 subject 2016 Mercedes-Benz involved in the subject collision.

17 7. Upon information and belief, at all times mentioned herein, and/or DEFENDANT DOE DRIVER  
18 I and/or DEFENDANT DOE DRIVER II-V was the driver of the vehicle owned by  
19 DEFENDANT SIXT RENT A CAR and/or DEFENDANT DOE OWNER I-V and was acting in  
20 the course and scope of his/her employment with ROE EMPLOYERS I-X at the time of the  
21 subject collision.

22 8. Upon information and belief, at all times relevant to this action, DOE DRIVER I-V, was and is a  
23 resident of Clark County, Nevada and/or was the driver of the subject 2016 Mercedes-Benz being  
24 operating on the roads and highways of the County of Clark, State of Nevada, and was  
25 driving/operating the subject automobile involved in the subject automobile collision.

26 9. On or about April 6, 2017, PLAINTIFF STINSON, was involved in a collision with an adverse  
27 driver, and PLAINTIFF VELAZQUEZ was his negligent-free passenger. The negligence of this  
28

1 adverse driver was the sole and proximate cause of the said automobile vs. automobile collision.  
2 As a result of the subject collision, PLAINTIFFS suffered debilitating and serious injuries, with  
3 each incurring in excess of Fifteen Thousand Dollars (\$15,000.00) in past medical special  
4 damages.

5 10. The true names and capacities, whether individual, corporate, partnership, associate or otherwise,  
6 of Defendants, DOES I through V and ROES I through V, are unknown to PLAINTIFFS, who  
7 therefore sue said Defendants by such fictitious names. PLAINTIFFS are informed and believe  
8 and thereon allege that each of the Defendants designated herein as DOE and ROE are responsible  
9 in some manner for the events and happenings referred to and caused damages proximately to  
10 PLAINTIFFS, as herein alleged, and that PLAINTIFFS will seek leave of this Court to amend  
11 this Complaint to insert the true names and capacities of all DOES I through V and all ROES I  
12 through V, when the same have been ascertained, and to join such Defendants in this action.

13 **FIRST CAUSE OF ACTION**

14 **(Negligence as to Defendants DOE DRIVER I,  
15 DOE DRIVER II-V and/or DOE OWNER I-V)**

16 11. PLAINTIFFS incorporate by this reference all of the allegations of paragraphs 1 through 10,  
17 hereinabove, as though completely set forth herein.  
18 12. On April 6, 2017, PLAINTIFF STINSON was operating his 2013 Nissan Leaf and was stopped  
19 Eastbound Sahara Avenue, waiting at a red signal at Sahara's intersection with Joe W. Brown,  
20 when suddenly and without notice, DOE DRIVER I and/or DOE DRIVER II, operating a 2016  
21 Mercedes-Benz, owned by DEFENDANT SIXT RENT A CAR and/or DEFENDANT DOE  
22 OWNER I-V, negligently operated the vehicle when he rear-ended PLAINTIFFS' vehicle,  
23 directly and proximately causing PLAINTIFFS injuries and damages, as more fully set forth  
24 hereinabove and below.  
25 13. That, following said collision, DOE DRIVER I and/or DOE DRIVER II-V, and non-party  
26 passenger MICHELLE MARIE PORTILLO fled the scene of the accident on foot.  
27 14. Based upon information and belief, MICHELLE MARIE PORTILLO was shortly thereafter  
28 located and questioned for fleeing the scene of the subject accident.

1 15. At the time of the subject rear-end collision herein complained of, and immediately prior thereto,  
2 DEFENDANT DOE DRIVER I and/or DOE DRIVER II-V, in breaching a duty owed to  
3 PLAINTIFFS, was negligent and careless, *inter alia*, in the following particulars:  
4 A. In failing to keep the 2016 Mercedes-Benz under proper control;  
5 B. In operating said 2016 Mercedes-Benz without due caution for the rights of PLAINTIFFS,  
6 and each of them;  
7 C. In failing to keep a proper lookout;  
8 D. In failing to use due care in the operation of said 2016 Mercedes-Benz;  
9 E. In operating a motor vehicle under the influence;  
10 F. In failing to keep the subject under proper control;  
11 G. In violating NRS 484C.110;  
12 H. In failing to stop and render aid to PLAINTIFFS;  
13 I. Negligent Entrustment;  
14 J. Vicarious liability through the operation of NRS 41.400;  
15 K. Vicarious liability through the operation of NRS 41.440;  
16 L. *Respondeat Superior*; and  
17 M. That DEFENDANTS DOE DRIVER I and/or DOE DRIVER II-V, and/or DEFENDANTS  
18 SIXT RENT A CAR and/or DOE OWNER I-V, and each of them, violated certain state and local  
19 statutes, rules, regulations, codes and ordinances, and PLAINTIFFS will pray leave of Court to  
20 insert the exact citations at the time of trial.  
21 16. By reason of the premises, and as a direct and proximate result of the aforesaid negligence and  
22 carelessness of DEFENDANTS, and each of them, PLAINTIFFS suffered physical injuries and  
23 were otherwise injured in and about their neck, back, legs, arms, organs, and systems, and were  
24 otherwise injured and caused to suffer great pain of body and mind, and all or some of the same  
25 is chronic and may be permanent and disabling, all to PLAINTIFFS' individual/respective  
26 damage in an amount not yet fully ascertained but nevertheless in excess of Fifteen Thousand  
27 Dollars (\$15,000.00).  
28

1 17. By reason of the premises, and as a direct and proximate result of the aforesaid negligence and  
2 carelessness of the said DEFENDANTS, and each of them, PLAINTIFFS have been caused to  
3 expend monies for medical and miscellaneous expenses, and will in the future be caused to expend  
4 additional monies for medical expenses and miscellaneous expenses incidental thereto, in a sum  
5 not yet presently ascertainable, and leave of Court will be requested to include said additional  
6 damages when the same have been fully determined.

7 18. Prior to the injuries complained of herein, PLAINTIFFS were able-bodied, capable of being  
8 gainfully employed and capable of engaging in all other activities for which PLAINTIFFS were  
9 otherwise suited. By reason of the premises, and as a direct and proximate result of the negligence  
10 of the said DEFENDANTS, and each of them, PLAINTIFFS were caused to be disabled and  
11 limited and restricted in their respective occupations and activities, which caused PLAINTIFFS  
12 a loss of wages in an unascertainable amount as of this time, and/or diminution of PLAINTIFFS  
13 earning capacity(ies) and future loss of wages, all to their individual and/or respective damage in  
14 a sum not yet presently ascertainable, the allegations of which PLAINTIFFS pray leave of Court  
15 to insert herein when the same shall be fully determined.

16 19. PLAINTIFFS have been required to retain the law firm of **BIGHORN LAW** to prosecute this  
17 action, and is entitled to recover their attorneys' fees, case costs and prejudgment interest.

18 **SECOND CAUSE OF ACTION**

19 (Negligent Entrustment as to DEFENDANT SIXT RENT A CAR and/or DOE OWNER I-V)

20 20. PLAINTIFFS incorporate by this reference all of the allegations of paragraphs 1 through 19,  
21 hereinabove, as though completely set forth herein.

22 21. That at the time of the accident herein complained of, and immediately prior thereto,  
23 DEFENDANT SIXT RENT A CAR and/or DOE OWNER I-V, was the registered owner of the  
24 said 2016 Mercedes-Benz being driven by DEFENDANT DOE DRIVER I and/or DEFENDANT  
25 DOE DRIVER II-V.

26 22. That at the time of the incident herein complained of, and immediately prior thereto,  
27 DEFENDANT SIXT RENT A CAR and/or DOE OWNER I-V, permitted, express or implied,

1 DEFENDANT DOE DRIVER I and/or DOE DRIVER II-V, to drive and operate the said 2016  
2 Mercedes-Benz.

3 23. That as a result of the express or implied permission stated herein, DEFENDANT SIXT RENT  
4 A CAR and/or DEFENDANT DOE OWNER I-V, is jointly and severally liable for any damages  
5 proximately resulting from the negligent actions and conduct of said DEFENDANTS, and each  
6 or all of them, as alleged within this Complaint.

7 24. That upon information and belief, DEFENDANT SIXT RENT A CAR and/or DEFENDANT  
8 DOE OWNER I-V, knew or should have known, that DEFENDANT DOE DRIVER and/or  
9 DEFENDANT DOE DRIVER II-V, was an inexperienced or incompetent or irresponsible driver,  
10 yet still entrusted the said 2016 Mercedes-Benz to DEFENDANT DOE DRIVER I and/or  
11 DEFENDANT DOE DRIVER II-V.

12 25. By reason of the premises, and as a direct and proximate result of the aforesaid negligence and  
13 carelessness of said DEFENDANTS, and each or all of them, PLAINTIFFS suffered physical  
14 injuries and were otherwise injured in and about their neck, back, legs, arms, organs, and systems,  
15 and were otherwise injured and caused to suffer great pain of body and mind, and all or some of  
16 the same is chronic and may be permanent and disabling, all to PLAINTIFFS' individual damage  
17 in an amount not yet fully ascertained but nevertheless in excess of Fifteen Thousand Dollars  
18 (\$15,000.00).

19 26. By reason of the premises, and as a direct and proximate result of the aforesaid negligence and  
20 carelessness of the DEFENDANTS, and each or all of them, PLAINTIFFS have been caused to  
21 expend monies for medical and miscellaneous expenses, and will in the future be caused to expend  
22 additional monies for medical expenses and miscellaneous expenses incidental thereto, in a sum  
23 not yet presently ascertainable, and leave of Court will be requested to include said additional  
24 damages when the same have been fully determined.

25 27. Prior to the injuries complained of herein, PLAINTIFFS were adults, capable of being gainfully  
26 employed and capable of engaging in various activities for which PLAINTIFFS were otherwise  
27 suited. By reason of the premises, and as a direct and proximate result of the negligence of the

1 said DEFENDANTS, and each or all of them, PLAINTIFFS were caused to be disabled and  
2 limited and restricted in their occupations and activities, which caused PLAINTIFFS a loss of  
3 wages in an unascertainable amount as of this time, and/or diminution of PLAINTIFFS' earning  
4 capacity and future loss of wages, all to their respective damage in a sum not yet presently  
5 ascertainable, the allegations of which PLAINTIFFS pray leave of Court to insert herein when  
6 the same shall be fully determined.

7 28. PLAINTIFFS have been required to retain the law firm of BIGHORN LAW to prosecute this  
8 action, and are entitled to recover their attorneys' fees, case costs and prejudgment interest.

9  
10 **THIRD CAUSE OF ACTION**  
**(Gross Negligence as to DOE DRIVER I  
and/or DOE DRIVER II-V)**

11  
12 29. PLAINTIFFS incorporate by this reference all of the allegations of paragraphs 1 through 28,  
13 hereinabove, as though completely set forth herein.

14 30. PLAINTIFFS are informed and believe and, based thereon allege, that DEFENDANT DOE  
15 DRIVER I and/or DOE DRIVER II-V owed PLAINTIFFS the duty of reasonable care, as set  
16 forth above.

17 31. Upon information and belief, at all times relevant to this action, DEFENDANT DOE DRIVER I  
18 and/or DEFENDANT DOE DRIVER II-V, intentionally, maliciously, willfully, oppressively,  
19 deliberately, in gross negligence and with a conscious disregard for the rights and/or safety of  
20 others, caused serious injuries to the PLAINTIFFS herein.

21 32. Upon information and belief, DEFENDANT DOE DRIVER I and/or DEFENDANT DOE  
22 DRIVER II-V, intentionally, maliciously, willfully, oppressively, deliberately, in gross  
23 negligence and with a conscious disregard for the rights and/or safety of others, disregarded the  
24 safety of others, and more particularly to the PLAINTIFFS herein, by operating a motor vehicle  
25 while under the influence of intoxicating liquor and/or a controlled substance and fleeing the  
26 scene of an accident without stopping, exchanging requisite information and rendering aid.

27 33. As a direct and proximate result of the gross negligence, malice and carelessness of  
28 DEFENDANT DOE DRIVER I and/or DEFENDANT DOE DRIVER II-V, PLAINTIFFS were

1 seriously injured and caused to suffer great pain of body and mind, all or some of which may be  
2 permanent and disabling in nature, entitling PLAINTIFFS to recover punitive and exemplary  
3 damages in an amount not presently ascertained but nevertheless in excess of Fifteen Thousand  
4 Dollars (\$15,000.00).

5 34. As further and direct and proximate result of the malicious, intentional, willful, oppressive  
6 deliberate, gross negligence and conscious disregard of the rights and safety of others,  
7 PLAINTIFFS incurred expenses for medical care, treatment and expenses incidental therein, and  
8 they may be required in the future to incur expenses for medical care and treatment.

9 35. Punitive and exemplary damages are appropriate as a means of punishing DEFENDANT DOE  
10 DRIVER I and/or DEFENDANT DOE DRIVER II-V, and as a means of deterring others,  
11 including DEFENDANT DOE DRIVER I and/or DOE DRIVER II-V from engaging in such  
12 behavior.

13 36. PLAINTIFFS have been required to retain BIGHORN LAW to prosecute this action, and are  
14 entitled to recover their attorneys' fees, case costs and prejudgment interest.

15 **PRAAYER FOR RELIEF INDIVIDUAL TO EACH PLAINTIFF**

16 1. General damages in an amount in excess of Fifteen Thousand Dollars (\$15,000.00);

17 2. Special damages for said Plaintiffs' medical and miscellaneous expenses as of this date, plus  
18 future medical expenses and the miscellaneous expenses incidental thereto in a presently unascertainable  
19 amount;

20 3. Special damages for lost wages in a presently unascertainable amount, and/or diminution of  
21 the earning capacity of said Plaintiffs, plus possible future loss of earnings and/or diminution of said  
22 Plaintiffs' earning capacity in a presently unascertainable amount;

23 4. Punitive and exemplary damages for said Plaintiffs in an amount in excess of Fifteen Thousand  
24 Dollars (\$15,000.00);

25 5. Costs of this suit;

26 6. Attorneys' fees; and

27 ////

28

7. For such other and further relief as to the Court may seem just and proper in the premises.

DATED this 2nd day of April, 2019.

## BIGHORN LAW

By: /s/ Jacob G. Leavitt, Esq.  
**KIMBALL J. JONES, ESQ.**  
Nevada Bar NO.:12982  
**JACOB G. LEAVITT, ESQ.**  
Nevada Bar No.: 12608  
716 South Jones Boulevard  
Las Vegas, Nevada 89107  
Attorneys for Plaintiffs

APR 09 2019